

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

KATHRYN KNOWLTON, et al,

Plaintiffs,

v.

Case No. 20-CV-01660

CITY OF WAUWATOSA, et al,

Defendants.

**PLAINTIFFS' MOTION FOR SANCTIONS
PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 11**

Plaintiffs, by and through their undersigned Counsel, hereby respectfully move this Honorable Court for an Order imposing sanctions pursuant to Rule 11 of the Federal Rules of Civil Procedure on the basis that Defendants' factual allegations in their Proposed Findings of Facts and motion for Summary Judgment are false as knowingly misleading to the Court in violation of Rule 11(b)(3). The grounds of this Motion are more fully set forth in the accompanying Brief in Support of Plaintiffs' Motion and supporting Declaration and exhibits which are incorporated by reference as if fully set forth herein.

Respectfully submitted this 22nd day of February, 2023.

COUNSEL FOR PLAINTIFFS

By: /s/ Kathryn L. Knowlton
Kathryn L. Knowlton
WI State Bar No. 1032814
Knowlton Law Group, LLC

7219 West Center Street
Wauwatosa, WI 53213
Telephone: (414) 202-2444
Email: kate@knowltonlawgroup.com

Kimberley Cy. Motley, Esq.
WI State Bar No. 1047193
Motley Legal Services
2206 Bonnie Butler Way
Charlotte, North Carolina 28270
Telephone: (704) 763-5413
Email : kmotley@motleylegal.com

E. Milo Schwab
Ascend Counsel
3000 Lawrence Street
Denver, CO 80205
Telephone : (732) 406-8215
Email : milo@ascendcounsel.co